

Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FRANTZ SAMSON, a Washington resident,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-JLR

**STIPULATED MOTION AND  
[PROPOSED] ORDER TO AMEND  
CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:  
FEBRUARY 28, 2019**

Pursuant to LCR 7(d)(1) and LCR 10(g), plaintiff Frantz Samson and defendant United HealthCare Services, Inc., by and through their counsel, hereby stipulate and move for a two week extension of the initial scheduling deadlines.

**STIPULATED MOTION**

The parties hereby stipulate as follows:

Plaintiff filed his putative class action complaint in King County Superior Court on January 9, 2019. (Dkt. # 1-1.) On February 5, 2019, defendant removed the action to this Court. (Dkt. # 1.) On February 8, 2019, the parties stipulated that good cause existed to extend the deadline for defendant's response to the complaint so defendant could investigate the conduct alleged in the

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AMEND CASE SCHEDULE (2:19-cv-00175-JLR)- PAGE 1

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1 complaint and prepare its response. (Dkt. # 6.) This Court granted that extension, and ordered that  
2 defendant's response to plaintiff's complaint is due on March 14, 2019. (Dkt. # 9.)

3 On February 20, 2019, this Court issued its Order Regarding Initial Disclosures, Joint Status  
4 Report, and Early Settlement. (Dkt. # 9.) In that Order, this Court set the following deadlines:  
5 (1) the parties must complete their FRCP 26(f) Conference by March 6, 2019; (2) the parties must  
6 serve initial disclosures by March 20, 2019; and (3) plaintiff must file the parties' Combined Joint  
7 Status Report and Discovery Plan by March 27, 2019. (*Id.*) The parties agree and stipulate that  
8 good cause exists to continue each of these deadlines by two weeks so that defendant has sufficient  
9 time to investigate the conduct at issue in the complaint, and defendant can file its response to the  
10 complaint before the parties engage in their FRCP 26(f) discovery conference.

11 Accordingly, the parties request that the initial scheduling deadlines be extended as follows:

|    |  |           |
|----|--|-----------|
| 12 | Deadline for FRCP 26(f) Conference:            | 3/20/2019 |
| 13 | Initial Disclosures Pursuant to FRCP 26(a)(1): | 4/3/2019  |
| 14 | Combined Joint Status Report and Discovery     | 4/10/2019 |
| 15 | Plan as Required by FRCP 26(f)                 |           |
| 16 | and Local Civil Rule 26(f):                    |           |

17 STIPULATED AND AGREED on February 28, 2019:

18 HOLLAND & KNIGHT LLP

19 TERRELL MARSHALL LAW GROUP  
PLLC

20 s/ Shannon Armstrong

20 s/ Beth E. Terrell

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24 Attorneys for Defendant

Attorneys for Plaintiff

**ORDER**

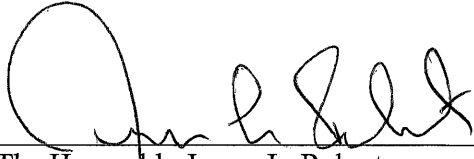
Pursuant to the above stipulation, and good cause appearing, IT IS SO ORDERED that the initial scheduling deadlines are amended as follows:

Deadline for FRCP 26(f) Conference: 3/20/2019

Initial Disclosures Pursuant to FRCP 26(a)(1): 4/3/2019

Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): 4/10/2019

DATED this 1 day of <sup>March</sup>~~February~~, 2019.

  
The Honorable James L. Robart  
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing STIPULATED MOTION AND [PROPOSED] ORDER TO AMEND CASE SCHEDULE to be served on the following person[s]:

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by causing the document to be delivered by the following indicated method or methods:

- ☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.
- ☐ by electronically mailed notice to the parties and/or their attorneys as shown above on the date set forth below.
- ☐ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- ☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.

DATED February 28, 2019.

s/ Shannon Armstrong  
Shannon Armstrong